

**REQUIRED STATEMENT
TO ACCOMPANY MOTIONS FOR RELIEF FROM STAY**

All Cases: Debtor(s) Verlener Corporation Case No. 09-38786 Chapter 11

All Cases: Moving Creditor BankFinancial FSB Date Case Filed October 16, 2009

Nature of Relief Sought: ☒ Lift Stay ☐ Annul Stay ☐ Other (describe) _____

Chapter 13: Date of Confirmation Hearing N/A or Date Plan Confirmed N/A

Chapter 7: ☐ No-Asset Report Filed on N/A
☐ No-Asset Report not Filed, Date of Creditors Meeting N/A

1. Collateral
 - a. ☐ Home
 - b. ☐ Car Year, Make, and Model _____
 - c. ☒ Other (describe) Commercial Real Estate
2. Balance Owed as of Petition Date \$ 693,294.41
Total of all other Liens against Collateral \$ Taxes 2008 2nd Installment \$11,388.27
3. In chapter 13 cases, attach a payment history listing the amounts and dates of all payments received from the debtor(s) post-petition.
4. Estimated Value of Collateral (must be supplied in *all* cases) \$ \$500,000.00 Per Schedule A & D.
5. Default
 - a. ☐ Pre-Petition Default
Number of months _____ Amount \$ _____
 - b. ☐ Post-Petition Default
 - i. ☐ On direct payments to the moving creditor
Number of months _____ Amount \$ _____
 - ii. ☐ On payments to the Standing Chapter 13 Trustee
Number of months _____ Amount \$ _____
6. Other Allegations
 - a. ☒ Lack of Adequate Protection § 362(d)(1)
 - i. ☐ No insurance
 - ii. ☐ Taxes unpaid Amount \$ _____
 - iii. ☐ Rapidly depreciating asset
 - iv. ☒ Other (describe) Adequate Protection Payments
 - b. ☒ No Equity and not Necessary for an Effective Reorganization § 362(d)(2)
 - c. ☒ Other "Cause" § 362(d)(1)
 - i. ☐ Bad Faith (describe) _____
 - ii. ☐ Multiple Filings
 - iii. ☒ Other (describe) Adequate Protection Payments
 - d. Debtor's Statement of Intention regarding the Collateral
 - i. ☐ Reaffirm
 - ii. ☐ Redeem
 - iii. ☐ Surrender
 - iv. ☐ No Statement of Intention Filed

Date: _____

Counsel for Movant